



STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

PO Box 43172 • Olympia, Washington 98504-3172

December 17, 1999

Mr. J.V. Parrish
Chief Executive Officer
Energy Northwest
PO Box 968 (MD 1023)
Richland, Washington 99352-0968

Subject: WNP-1/4 Site Restoration

Dear Mr. Parrish:

At its regular meeting on December 13, 1999, the Council adopted a series of observations, timelines, and directives to guide the development and implementation of site restoration/reuse activities at the WNP-1 and WNP-4 projects. These are based on comments received from interested parties and observations made by members during visits to units 1 and 4. The Council is very much interested in proceeding with steps that will address the public health and safety issues at the site, particularly at WNP-4; allowing reuse feasibility studies to be completed; and pursuing a long-term plan for the disposition of the facilities and structures at the site.

The observations and directives that follow reflect the Council's understanding that a number of parties must work together to reach agreement on restoration and/or reuse activities and plans that have both short-term and long-term implications. The Council is committing to work with Energy Northwest; federal agencies including U.S. Department of Energy- Richland Operations Office (USDOE) and Bonneville Power Administration (BPA); affected Indian tribes; local jurisdictions; and the public, in developing a plan that meets the varied needs of those parties. At the same time, the Council will need to ensure that any restoration or redevelopment activities are accomplished in a manner that meets the state's responsibility to protect the public safety and the environment.

The Council understands that discussions are underway between USDOE-Richland and BPA that will help to clarify the Department of Energy's interests as leaseholder and BPA's ability to fund restoration or demolition work. The Council is committed to cooperating fully with Energy Northwest and these two USDOE branches in determining the best approach for ensuring that future activities at the 1/4 site will meet the broad public interests that we all represent.

Observations

In developing its timelines and directives, the Council made the following general observations.

- Representatives from the Benton Redevelopment Initiative (BRI) have requested that the Council delay any action on restoration alternatives until phases I and II of their review of economic development alternatives are completed. BRI estimates that phase I will be complete in March 2000, and phase II by the end of 2000.
- There appears to be consensus that the twenty items identified on pages 44 and 45 of the “Site Restoration Plan” are reasonable to undertake regardless of the ultimate restoration plans for the two sites.
- There also appears to be consensus that one of the major uncertainties regarding economic development of the site is the issue of water rights. Other uncertainties include the distance of the site to population centers, and the requirement for an evacuation plan for workers in the vicinity of WNP-2.
- After visiting the sites and holding discussions with major stakeholders, the Council concludes that there is little likely reuse opportunity for the structures at WNP-4. Moreover, existing structures and construction debris pose a major health and safety hazard. This hazard may increase if economic activity heightens in the vicinity.
- Discussions among Energy Northwest, BPA, and the USDOE appear to be ongoing and may lead to a consensual level of restoration among those three entities.

Directives

As a result of these comments and observations, the Council adopted the following directives for actions that will need occur over the next two years. These directives are developed to ensure that restoration activities are pursued in an orderly manner, while providing time for a full evaluation of the redevelopment options that are being pursued.

The directives are presented separately for WNP-1 and WNP-4 because the time lines are different for each project. However, the Council fully intends that any activities at either site will be carried out as part of an overall plan that deals with both projects, consistent with the combined Site Certification Agreement.

The Council also recognizes that Energy Northwest may have constraints at this time in committing to certain restoration tasks identified in the plan. However, we continue to feel that there must be a demonstration that activities are proceeding that would ultimately lead to the plan being carried out. We are asking that Energy Northwest present a work plan of activities that would lead to tasks being completed as resources are

made available for those purposes. Your staff indicated at the meeting that such a plan could be presented in early January, at least in preliminary form.

WNP-1

All plans to make this facility an operating nuclear power plant have been abandoned. Based on the extent of development at the time the nuclear project was terminated, there is considerable and extensive infrastructure present with potential for re-development to other non-nuclear power uses. There are groups actively investigating opportunities for re-development at this site. These groups deserve time to examine options for possible re-development. EFSEC will not take any steps to force site restoration that might hinder or otherwise restrict future use at this site, except to the extent necessary to protect public health, safety and the environment.

At the same time WNP-1 does require work before any re-use can take place. Energy Northwest in its June 1999 "Site Restoration Plan" identified 12 initial Demolition and Restoration Tasks (page 29). Conducting any or all of these 12 Initial Actions will not hamper or irrevocably affect re-development possibilities.

Progress towards site restoration/reuse at WNP-1 should include the following actions on the part of ENW:

1. Energy Northwest should develop a work plan identifying those activities that will lead to the successful completion of the 12 WNP-1 Initial Demolition and Restoration Tasks listed on page 29 of the June 1999 Restoration Plan. Energy Northwest should submit this work plan to EFSEC by January 10, 2000. The work plan should provide for submitting these items to EFSEC for timely approval. EFSEC will assume that all items do require EFSEC approval unless Energy Northwest makes a case to the contrary.
2. Energy Northwest should provide an updated Site Restoration Plan for WNP-1 within 24 months. The Updated WNP-1 Site Restoration Plan should take into consideration re-use/re-development recommendations identified through the local partnership effort. Energy Northwest should continue to provide bimonthly briefings to EFSEC concerning its progress towards developing a revised Site Restoration plan. EFSEC staff will work with your staff to identify appropriate ENW personnel for each such briefing.
3. Energy Northwest, independently or through its involvement with BRI, should pursue and resolve water issues at all necessary forums, including both state and federal consultations. The Council expects to see significant progress in addressing and resolving these issues during the year 2000.

WNP-4

WNP-4 is a partially constructed nuclear power plant. The extent of development at the facility does not provide potential for site re-development. In fact the site offers a considerable risk to public health and safety due to the stage construction was in at the time construction was suspended. Given the nature of the WNP-4 site and the extent of

risk present, and the limited economic potential of the structures on this property, Energy Northwest should immediately commence site restoration.

Site restoration at WNP-4 should include the following actions:

1. Energy Northwest should develop a work plan identifying those activities that will lead to the successful completion of the 18 WNP-4 Initial Demolition and Restoration Tasks listed on page 29 of the June 1999 Restoration Plan. Energy Northwest should submit this work plan to EFSEC by January 10, 2000. The work plan should provide for submitting these items to EFSEC for timely approval. EFSEC will assume that all items do require EFSEC approval unless Energy Northwest makes a case to the contrary.
2. Energy Northwest should provide an updated Site Restoration plan and schedule for WNP-4 within 12 months. Energy Northwest should continue to provide bimonthly briefings to EFSEC concerning its progress towards developing a revised site restoration plan.
3. Site restoration at WNP-4 should be consistent with the requirements of USDOE (site lessor), except as described below.
4. Independently of any position taken by USDOE, any restoration and demolition level proposed by Energy Northwest be consistent with the long term health and safety of Washington's citizens and protect the environment.

For its part, the Council will not draw any ultimate conclusions regarding ultimate restoration of the sites pending the reports and conclusions from BRI and ENW, expected some time during the next 24 months. Furthermore, the Council has directed me to begin immediate discussions with USDOE to work towards a consensus on appropriate restoration levels for both sites, and to carry on discussions with BPA concerning funding options.

The Council recognizes that there are a number of different issues that must be addressed in reaching agreement on the future of the 1 and 4 site. We are committed, as are you, to ensure the future safety of the site, while maximizing any potential for future reuse of site assets.

Sincerely,

/S/

Deborah Ross
Chair

cc: Interested persons
Dave Fraley, Energy Northwest